

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
SOUTHERN DIVISION

REGIS INSURANCE COMPANY,)
)
Plaintiff,)
)
vs.)
)
P&C GROCERS, INC., a corporation;)
CHARLES PARKER, an agent of same; and)
CECELIA GIBBS, an individual;)
)
Defendants.)

1:06-cv-125-MEF

PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT

Plaintiff Regis Insurance Company (“Regis”) pursuant to Rule 56, Fed. R. Civ. P., seeks summary judgment as to all claims alleged in the Complaint for Declaratory Judgment. As grounds for this motion, Regis asserts that (a) there is no genuine issue as to any material fact and (b) judgment as a matter of law is due to be entered in its favor.

In support of this Motion, Regis submits the following:

- a. The pleadings of the parties and the Court’s file.
- b. A copy of the complaint filed in Cecelia Gibbs v. P&C Grocers, et al., 05-CV-00912-MHT-SRW, in the United States District Court for the Middle District of Alabama, Southern Division, attached hereto as **Exhibit 1**.
- c. A certified copy of Regis Multi-Peril General Liability Insurance Policy No. RM-126366, attached hereto as **Exhibit 2**.

- d. The Brief in Support of Plaintiff's Motion for Summary Judgment, attached hereto as **Exhibit 3**.

WHEREFORE, PREMISES CONSIDERED, Regis respectfully requests that the Court enter an Order granting summary judgment in its favor and against the Defendants on all of Regis' claims.

s/ Brennan C. Ohme
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CERTIFICATE OF SERVICE

I certify that on AUGUST 7TH, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing and/or that a copy of the foregoing has been served by United States Mail, properly addressed and postage pre-paid, to the following:

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s/ Brennan C. Ohme
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